

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

_____	x	
	:	<b>Chapter 11</b>
<b>In re:</b>	:	
	:	<b>Case No. 08-13555 (SCC)</b>
<b>LEHMAN BROTHERS HOLDINGS INC., et al.,</b>	:	
	:	
<b>Debtors.</b>	:	
_____	x	

**AMENDED ALTERNATIVE DISPUTE RESOLUTION  
PROCEDURES ORDERS FOR INDEMNIFICATION CLAIMS  
OF THE DEBTORS AGAINST CERTAIN MORTGAGE LOAN SELLERS**

Upon the motion of Lehman Brothers Holdings Inc. (“LBHI”), as Plan Administrator, for Leave to Amend and Extend the Scope of the Alternative Dispute Resolution Procedures Orders For Indemnification Claims of the Debtors Against Mortgage Loan Sellers, dated October 1, 2018 [Docket No. 58858] (the “Motion”),<sup>1</sup> including the amendment of the Alternative Dispute Resolution Procedures Order for Indemnification Claims of the Debtors Against Mortgage Loan Seller SecurityNational Mortgage Company (“SecurityNational”), dated August 12, 2014 [Docket No. 45702] (the “Modified ADR Order”), in the chapter 11 cases of LBHI and its affiliated debtors, all as more fully described in the Motion; and SecurityNational having filed an objection, dated October 23, 2018 (the “Objection”); and the hearing on SecurityNational’s Objection having been held on October 29, 2018; and the parties having conferred and agreed to the modified Indemnification ADR Procedures set forth below; and, notwithstanding anything that may be to the contrary, SecurityNational does not and has not waived its Objection and reserves all rights including, but not limited to, those set forth in its Objection and

<sup>1</sup> Capitalized terms used but not defined herein shall have the meanings ascribed to them in the Motion.

SecurityNational's objection referenced in the August 12, 2014 Modified ADR Order, now, therefore,

**IT IS HEREBY FOUND AND DETERMINED THAT THE MODIFIED ADR ORDER IS AMENDED AS FOLLOWS:**

A. The Indemnification ADR Procedures are expanded to include Indemnification Claims arising from this Court's estimation of certain RMBS Trustees' allowed claims in LBHI's bankruptcy case [Docket No. 57785] and the allowance of certain RMBS Trustees' claims that were settled in the ordinary course of business.

B. Ira Herman will no longer be included as a potential mediator.

C. Schedule A of the Modified ADR Order is supplemented to include the following mediators:

Mediator	Contact information
John Kenney	Hoguet Newman Regal & Kenney, LLP One Grand Central Place 60 E 42 <sup>nd</sup> St., 48 <sup>th</sup> Floor New York, New York 10017 Tel: (212) 689-8808 Email: jkenney@hnrklaw.com
Jon Landers	Scarola Zubatov Schaffzin PLLC 1700 Broadway, 41 <sup>st</sup> floor New York, New York 10019 Tel: (212) 757-0007 Email: jonathan.landiers@szslaw.com
Monica McCabe	Phillips Nizer LLP 485 Lexington Avenue New York, New York 10017 Tel: (212) 841-0713 Email: mmccabe@phillipsnizer.com
Dan Murdock	Daniel R. Murdock, Esq. 90 Horton Street City Island, New York 10464 Tel: (914) 738-1486 (landline)

	danielrmurdock@outlook.com
Debbie Reperowitz	Stradley Ronon 100 Park Avenue, Suite 2000 New York, New York 10017 Tel: (212) 812-4138 Email: dreperowitz@stradley.com
Hon. Donold H. Steckroth (Ret.)	Cole Schotz P.C. 1325 Avenue of the Americas 19 <sup>th</sup> Floor New York, New York 10019 Tel: (212)-752-8000 Email: dsteckroth@coleschotz.com

D. All other provisions and aspects of the Modified ADR Order shall remain in full force and effect, including but not limited to all reservations of rights and non-waiver of such, and which reservations of rights and non-waivers include application to the claims in the foregoing paragraph A.

**IT IS SO ORDERED:**

December 17, 2018  
New York, New York

/S/ Shelley C. Chapman  
UNITED STATES BANKRUPTCY JUDGE